

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

GOLDI Y. CAPALUNGAN	:		
	:	Case No.:	2:18-cv-1276
Petitioner,	:	Judge:	Smith
vs.	:	Magistrate Judge:	Jolson
EMMANUEL R. LEE	:		
	:		
Respondent.	:		

**PETITIONER, GOLDI Y. CAPALUNGAN'S  
AMENDED DISCLOSURE OF EXHIBITS**

Now comes the Petitioner, Goldi Y. Capalungan, by and through Counsel, and hereby submits her disclosure of exhibits pursuant to the Court's Order dated March 28, 2019. The Petitioner will introduce into evidence the following:

- (1) Letter ( 4/11/18) re: EZL attendance to day care ( Australia)
- (2) Email exchange ( 1/25/1) re: Petitioner's job and EZL coming to the Columbus Ohio -2/22/17)
- (3) Round trip Plane Tickets Sydney to Columbus ( 2/18/17
- (4) Email exchange re: length of time to obtain permanent resident status ( 2/5/17)
- (5) Email exchange regarding mediation ( 4/13/17)
- (6) Petitioner's email – concern about mediation ( 4/13/17)
- (7) Respondent's email regarding marriage and effect on mediation ( 4/29/17)
- (8) Shared Parenting Plan ( 7/18/17)
- (9) Email exchange regarding EZL passport and notarized statement ( 7/17/17)
- (10) Petitioner's email re: immigration status EZL ( 7/24/17)

- (11) Respondent's email regarding immigration status EZL and can't leave country 8/4/17) and update of passport in Australia.
- (12) Petitioner's email ( 8/9/17) raising concern about shared parenting plan and Respondent's response ( mother is default custodian)
- (13) Respondent's Email ( 11/10/17) regarding processing date for permanent resident application for EZL ( expect December)
- (14) Email by Respondent's sister regarding return of EZL to Australia ( 1/9/18)
- (15) Email exchange ( 1/2/18) re: release of passport and return of EZL
- (16) Email exchange ( 1/2/18) re: US passports and return of EZL to Australia
- (17) Email exchange ( 2/2/18) regarding purpose of mediation and return of EZL
- (18) Email exchange ( 4/2/18) Respondent admits agreement to return EZL
- (19) Respondent's email ( 4/2/18) admits father to return EZL to Australia
- (20) Email of Respondent's sister's ( 2/8/18) acknowledging return of EZL
- (21) Email exchange ( 2/8/18) Respondent admits EZL to be returned after passport issued
- (22) Respondent's email ( 2/12/18) " all bets off"
- (23) Photograph of Respondent burning the passport of EZL
- (24) Email exchange re: burnt passport ( 2/12/18)
- (25) Respondent's email ( 2/13/18) admits tricked Petitioner on shared parenting
- (26) Email exchange (2/23/18) re: meaning of shared parenting plan and return of EZL to Australia Respondent's deposition Exhibit 34 ( new)
- (27) Respondent's email (2/20/18 )refuses to return EZL to Australia despite agreement to return child. Child stays until Respondent decides to return EZL
- (28) Email exchange ( 3/4/18) wherein Respondent acknowledges tricked Petitioner on purpose of mediation; Petitioner requests return of child.

- (29) Email Exchange ( 3/15/18) regarding Petitioner's visit to Columbus and supervised visitation
- (30) Respondent's email ( 3/20/18) Petitioner " broke agreement)
- (31) Respondent's email ( 3/20/18) admits EZL to be returned when passport issued
- (32) Email exchange ( 3/29/18) Respondent admits he is upset because Petitioner called authorities regarding child's care.
- (33) Email exchange 3/29/18 Petitioner requests return of child.
- (34) Visa Notification issued by the Australian Dept of Immigration ( new)
- (35) EZL Permanent Resident Card issued 1/6/18
- (36) US passport issued to EZL (2/16/18)
- (37) Affidavit of applicable Australian law (new)

Respectfully Submitted:

GARY J. GOTTFRIED, CO., L.P.A.

/s/ Gary J. Gottfried  
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**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing Respondent's amended Disclosure of Witnesses was served upon Gregg Lewis, Attorney for Respondent by way of email correspondence on this 2<sup>nd</sup> day of April 2019

/s/ Gary J. Gottfried  
Gary J. Gottfried (0002916)  
Counsel for Respondent